



State of Montana

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WHAT IS THE PERFORMANCE PERIOD FOR THE GRANT?

The performance period is the window of time in which all grant expenditures must be expended. For example:

- The FY2016 EMPG grant performance period is October 1, 2016 - Sept 30, 2017.

All expenditures associated with your FY2016 award must be made within the associated time frame. Any expenditures made outside the performance period are not eligible for that grant year.

WHAT FORMS ARE DUE WHEN?

- For FY2017, the EMPG application is due to MTDES on or about March 01, 2017. The WebGrants application will be open on or about Jan 02, 2017
- Quarterly Programmatic Reports are due to your DFO's by the 5th day after the end of each quarter.
- Sub-recipient Quarterly Reimbursement Requests are due no later than 45 calendar days after the end of each quarter.
- Accruals are due the second week of June.
- Grant Risk Assessment due the second week of September. Must be submitted prior to award of grant.

1 st Quarter	Oct- Dec
2 nd Quarter	Jan-March
3 rd Quarter	April-June
4 th Quarter	July-Sept

ALLOWABLE EXPENDITURES

Planning:

CAN I USE EMPG FUNDS TO DEVELOP OR ENHANCE EMERGENCY MANAGEMENT PLANNING ACTIVITIES?

Yes. Planning spans all five National Preparedness Goal mission areas.

Travel:

WHAT ARE THE REQUIRED CRITERIA FOR AUTHORIZED TRAVEL/REIMBURSEMENT?

In order to be eligible for reimbursement under the EMPG program, travel must meet the following criteria:



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- Must be official business related to approved training, exercise activities and/or linked to accomplishing activities outlined in the EMPG program work plan.
- Must be verifiable, allowable, allocable and reasonable and may include airfare, mileage, per diem and hotel.
- An agenda for the meeting/conference must be kept on file with your claim/reimbursement documentation.
- Per federal policy, your travel must also abide by local/state travel policy, whichever is more stringent. For reference, the State of Montana Travel Policy can be found at: <https://sfsd.mt.gov/SAB/EmployeeTravel>

What documentation is required for travel reimbursement?

Reimbursement requests must include:

- Original receipts for all expenditures, including flight, baggage, taxi fare, hotel, etc.
- An agenda from the attended event (if applicable)

ORGANIZATION:

What are Organization Costs?

Organization costs include personnel costs (salary, overtime, compensatory time off, and associated fringe benefits) for a jurisdiction's emergency management staff. These costs must comply with 2 C.F.R. Part 200, Subpart E—Cost Principles, and be approved as part of your initial EMPG application or subsequent amendment.

EQUIPMENT:

What Equipment is allowable under EMPG? Ref. §200.313:

Equipment purchases under the EMPG program must be reasonable, allocable, allowable, and necessary to accomplish the projects identified in the jurisdiction's application. For a list of equipment see the Authorized Equipment List (AEL) at <http://www.fema.gov/preparedness-non-disaster-grants> or <http://www.fema.gov/grants>, specifically categories 1,4,5,6,7,10,11,12,14,19,21.

Additionally:

- Equipment must be used for the authorized purposes of the project during the period of performance, or until the property is no longer needed for the purposes of the project.
- Agencies must obtain and maintain all necessary certifications and licenses for the requested equipment.
- Equipment is considered any item over \$5000.00 dollars with a lifespan of greater than 1 year.
- Jurisdictions must submit an Equipment and Accountable Supplies Form with their Quarterly Report for any equipment purchases.



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What is the process for Equipment Disposition? §200.313(e):

Pending MT DES approval, equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the federal awarding agency. Please contact MT DES for specific guidance.

TRAINING:

Can I use EMPG funds for Training-related costs?

Yes. EMPG funds can be used to:

- Develop, deliver, and evaluate training.
- Provide for overtime and backfill costs in accordance with the NOFO.
- Fund travel (e.g., airfare, mileage, per diem and hotel)—see above for reimbursement requirements
- Hire full or part-time staff or contractors/consultants.
- Assist with Instructor (re)certification.

EXERCISES:

Can I use EMPG funds for Exercise-related costs?

Yes. EMPG funds can be used to:

- Design, develop, conduct, and evaluate an exercise.
- Hire full or part-time staff or contractors/consultants.
- Cover overtime and backfill costs in accordance with NOFO.
- Fund travel. (e.g., airfare, mileage, per diem, and hotel)
- Purchase supplies for the exercise.
- Implement HSEEP principles into exercise program.
- Support other expenditures (e.g., limited items consumed in direct support of exercise activities (i.e., location rentals for planning and conducting exercises, equipment rentals, and procurement of essential nondurable goods).
- Purchase limited food/snacks/water (see below for more detail)

Are food purchases allowable under the EMPG grant?

Yes. However, food purchases must adhere to the following:

- Training and exercises—light refreshments.
- Working lunches—allowable only if the duration of the training/exercise exceeds a 4 hour period. Specifically, 2 hours prior to lunch and 2 hours following.
- EOC activations—food expenses are allowable provided they meet the allowable, allocable, and reasonable criteria. If the county/tribe is under a state or federal declaration, food costs should be reimbursed under the Public Assistance Program.



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- Providing food for meetings and conferences is **not** an allowable expense.
- Providing bottled water is **not** an allowable expense unless potable water is not within 100 yards of the event; in such cases, providing bottled water to participants is allowable.

CONSTRUCTION AND RENOVATION:

Are construction and renovation projects allowable under EMPG?

Yes. A written request must be submitted to MT DES with your EMPG application for FEMA's approval prior to the start of any construction.

This submission must include an Environmental & Historic Preservation (EHP) review.

SUPPLIES:

What types of supplies are allowable under EMPG?

Supplies that directly support the Emergency Management Program are eligible, provided they do not violate any other grant guidance or Federal requirement. Examples of eligible supply purchases are:

- Supplies for training and exercises that are expended or consumed during the course of the planning and conducting of the exercise activities (e.g., gloves, non-sterile masks and disposable protective equipment)
- General office supplies critical to the function of the EM Program and reasonable in cost and quantity.
- Emergency supplies (e.g., shelf-stable food, water and/or basic medical supplies) not to exceed \$100,000.
- Supplies are those expenditures which are expendable, below \$3,000.00 in cost, and typically have less than a one year lifespan.
- Accountable Supplies are those expenditures which are expendable, above \$3,000.00 in cost, and typically have a lifespan of greater than one year.

PROFESSIONAL AND CONSULTANT SERVICES: Ref. §200.231, 200.326, & 200.323

Are Professional and Consultant Services allowable under EMPG?

Yes, under specific circumstances, provided they are reasonable in scope and result in a product that directly benefits the jurisdiction's EM program. Please contact MTDES grants personnel for additional information regarding consultant services.

MAINTENANCE CONTRACTS AND WARRANTY COVERAGE §200.452

Are Maintenance Contracts and Warranty Coverage allowable under EMPG?

Yes. In accordance with 2 CFR §200.452, costs incurred for utilities, insurance, security, necessary maintenance, janitorial services, repair, or upkeep of buildings and equipment (including Federal property



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unless otherwise provided for) which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition, are allowable. Costs incurred for improvements which add to the permanent value of the buildings and equipment or appreciably prolong their intended life must be treated as capital expenditures (see §200.439 Equipment and other capital expenditures). These costs are only allowable to the extent that they are not paid through rental or other agreements.

AMENDMENTS AND/OR CHANGES TO THE APPLICATION

Can I request to amend or change the project scope or budget during the performance period? Ref. §200.308

Yes. Amendments and/or changes can be requested by contacting your MT DES Grant Program Manager. Amendments should be submitted for:

- Change in scope or objectives or cost reallocations of project goals or expected outcomes.
- Change of authorized official or key personnel, including any reduction or increase in time or salary, as well as other significant personnel changes.

What do I submit to the EMPG Program Coordinator for an amendment request?

Please submit an official letter including the following:

- A strong justification for approval
- Information on how the change meets original program intent
- Compliance with grant terms and conditions
- Identify costs that are allowable, allocable, reasonable, and necessary, in accordance with 2 CFR subpart E (cost principles) and the applicable fiscal year funding opportunity and program guidance.

How soon will I hear back from MT DES on amendment requests?

MT DES reviews requests and notifies sub-recipients of acceptance and/or approval with special conditions within 30 days. An approved request results in a modification to the award documentation.

Accrual Process

An accrual, as found in the Montana Operations Manual, is the recognition of expenditure activity prior to its actual receipt or disbursement. Accruals must be submitted to the SAA annually not later than the second week of June for approval.

Valid accruable expenditures should include:

- Materials and supplies expended in the fiscal year in which they are received;



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- Goods ordered but not received as of the fiscal year end if accompanied with a purchase order to verify date of order/purchase;
- Services rendered in the fiscal year which they were charged;
- Equipment charged against the fiscal year in which the purchase order was issued;
- Contracts or other legal commitments relate dot unperformed legally binding contracts in process at year end;
- Must be accompanied by valid supporting documentation which must be submitted to the SAA upon request, prior to award of accrual funds.

REQUIREMENTS FOR EMPG FUNDED PERSONNEL

What requirements do EMPG Program funded personnel have to meet?

All EMPG Program funded personnel must meet the following criteria:

The elements listed below are the minimum requirements for participation in the EMPG Program, as found in the EMPG Procedures Manual:

- Maintain an emergency plan and program that is in accordance with, and in support of, the State's disaster and emergency plan, the Montana Emergency Response Framework (MERF), and the State program.
- Complete and record proof of completion of NIMS training, Independent Study (IS) 100, 200, 700, and 800, training. In addition, complete either the IS Professional Development Series or the National Emergency Management Basic Academy.
- EOPs must be reviewed, updated, and submitted to the SAA every two years, at a minimum.
- Designate a primary and alternate Emergency Operations Center (EOC)
- Develop and maintain a Resource List of personnel and equipment. Include contact information for public (municipal, county, tribal), private and volunteer personnel.
- Facilitate or participate in your Local Emergency Planning Committee (LEPC), Tribal Emergency Response Commission (TERC), or other all-hazards community planning group. Meeting minutes and membership lists are provided to the State Emergency Response Commission (SERC) via Montana DES. Working with your all-hazard community planning group:
 - Identify local preparedness and response partners and their roles and responsibilities
 - Identify facilities and location designated for emergency use
 - Routinely review and maintain the necessary emergency plans
 - Review your jurisdiction's Threat and Hazard Risk Assessment (THIRA)



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- Develop a Training and Exercise Plan (TEP) for your jurisdiction
- All EMPG-funded personnel will participate in at least three exercises, as defined by the Homeland Security Exercise and Evaluation Program (HSEEP), within a twelve-month period. At least one exercise should be an operations-based exercise. Participating in or shadowing an ICS/EOC Command and General Staff position during a real-world event, when possible, is suggested. The exercise could be in collaboration with other agencies that also have a similar requirement and can be counted as one of the three exercises required for EMPG funding.
 - Complete an After Action Report/Improvement Plan (AAR/IP) within 90 days of the exercise or real world event and submit to MT DES.
- Attend MT DES' Coordinators Workshop
- Actively participate in the THIRA/ SPR process.
- Per 2CFR 200.205, prior to award, all sub recipients must submit a completed grant risk assessment. (This is different from the THIRA).
- Have the following on file with MT DES:
 - Oath of Office from Authority Having Jurisdiction (AHJ). Normally this is the Principle Executive Officer, e.g., Mayor, Tribal Chair, Commissioner.
 - Letter of appointment from Authority Having Jurisdiction (Applicant Agent Letter)
 - State/Tribal and Local Agreement (SLA)
 - Information release authorization form with contact information
 - Jurisdictional Emergency Operations Plan (EOP) signed by the Principle Executive Officer
 - Sub Recipient grant risk assessment

Proof of these items should be included in the quarterly programmatic reports, unless otherwise instructed.

ENVIRONMENTAL PLANNING & HISTORIC PRESERVATION

Does the Environmental Planning & Historic Preservation (EHP) Compliance application apply to my project(s)?

The EHP application/review process is required before any federal funds can be expended on a project if said project falls into the following categories:

- **RENOVATION/UPGRADES/MODIFICATIONS OR PHYSICAL SECURITY ENHANCEMENTS**

TO EXISTING STRUCTURES: The project impacts the environment, including building modification or renovation and new construction.



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- **PURCHASE OF EQUIPMENT:** The project includes the purchase of equipment that requires installation on or in a building or structure.
- **TRAINING AND EXERCISE:** The project involves training exercises with a field-based component, such as drills or full-scale exercises.
- **GENERATOR INSTALLATION:** The project involves installation of new or replacement generators, to include the concrete pads, underground fuel and electric lines, and if necessary a fuel storage tank.
- **NEW CONSTRUCTION/ADDITION:** The project involves new construction, addition to, or expansion of a facility.
- **COMMUNICATION TOWERS, ANTENNAS, AND RELATED EQUIPMENT:** The project involves construction of a new or replacement communications towers, or installation of communications related equipment on a tower or building or in a communications shelter or building.
- **OTHER:** The project does not fit in any of the categories listed above.

The application review process is submitted to MT DES's program coordinator; the program coordinator submits the application to FEMA Region VIII's Grant Programs Directorate accordingly. Depending on the type of project, the timeline for response will vary.

MONITORING/TECHNICAL ASSISTANCE

What does a MTDES the Programmatic/Financial Monitoring include?

In accordance with 2 CFR §200.328, monitoring involves the review and analysis of programmatic, financial, performance, compliance and administrative processes, policies, activities, and other attributes of the EMPG award, and identifies areas where technical assistance, corrective actions and other support may be needed. MT DES conducts monitoring visits to ensure compliance with the program guidance in one of three ways:

- **MTDES DESK BASED REVIEWS:** technical support is provided during the period of performance via email and phone.
- **TECHNICAL SUPPORT SITE VISITS:** one-on-one meetings with the sub-recipient to provide support in specific aspects of the EMPG program or process. These are conducted at the request of the sub-recipient.
- **SCHEDULED SITE MONITORING VISITS:** meetings at the office of the sub-recipient with the grant program staff.
- These are the opportunities for questions to be asked, best practices to be shared, and concerns to be addressed. Also for review of programmatic forms and discussion of program requirements as outlined in the grant guidance; to discuss possible changes and/or amendments, to provide new



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personnel with an overview of the grant requirements, and/or provide any additional support to grants staff as needed.

All monitoring visits are coordinated with sub-recipients in advance. Sub-recipients are provided with pre-site visit notification in the form of email on agency letterhead. During the visit, a formal checklist is used to ask various programmatic, financial, performance, compliance and administrative processes, policies, activities questions.

Additional Performance Measures and Risk Assessment Considerations:

- Is the sub-recipient using the standard forms provided by MT DES when providing performance updates?
- Are quarterly activity reports submitted consistently and in a timely manner?
- Do the quarterly activity reports include progress toward completing the activities and projects stated and approved in their EMPG application?
- Do the activity reports validate how expenditures support maintenance and sustainment of current goal core capabilities?
- Do the activities support progress made towards implementing the National Preparedness System?

COST SHARE & MATCH

Does EMPG have a Cost Share requirement?

Yes. EMPG is a 50/50 cost share grant, with each federal dollar requiring a sub-recipient dollar to match it.

In accordance with 2 CFR §200.306 (b), the sub-recipient's portion of the cost share must be:

- Documented
- Not included as contributions for any other Federal award
- Necessary and reasonable for accomplishment of project or program objectives
- Allowable under Subpart E—Cost Principles of this 2 CFR §200.306
- Not paid by the Federal government under another federal award, except where the federal statute authorizing a program specifically provides that federal funds made available for such programs can be applied to matching or cost sharing requirements of other federal programs.

What constitutes Soft Match?

EMPG requires a 50% match from all participating entities. Soft match can be provided using either in-kind match of donated time and effort, real and non-expendable property, goods and services. Eligible match includes contributions that are:



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- Documented
- Not included as contributions for any other federally assisted project or program.
- Verifiable from the Applicant's record.
- Are necessary and reasonable for proper and efficient accomplishment of the project's scope of work.
- Are allowable under applicable cost principles—see 2 CFR Part 225
- Are determined as eligible costs in the budget.
- Conform to regulations.

Eligible In-Kind Sources:

- Contributions that are necessary for the proper and efficient accomplishment of the project, including:
- Time and/or mileage specific to the project, as applicable.
- Donated equipment specific to the project.
- Donations of third party time, supplies or money.

CONTACTS:

Casey Fuller, Grants Program Manager

Districts 2, 3 & 4

(406) 324-4758 | cfuller2@mt.gov

Eric Kiltz, Grants Program Manager

Districts 1, 5 & 6

(406) 324-4751 | ekiltz@mt.gov

Montana Disaster and Emergency Services

1956 Mt. Majo Street

Fort Harrison, MT 59636-4789